

November 28, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **VoIP E911 Compliance Report (November 28, 2005)**  
**Big River Telephone Company, LLC; WC Docket No. 05-196**

Dear Ms. Dortch:

Big River Telephone Company, LLC ("Big River"), through its undersigned counsel and pursuant to Commission Rule 9.5(f), as adopted by the Commission's *VoIP E911 Order*<sup>1</sup> concerning the enhanced 911 ("E911") service requirements and conditions applicable to interconnected Voice over Internet Protocol ("VoIP") service providers, submits this Compliance Report ("Report") to advise the Commission of the status of Big River's efforts to comply with the Commission's VoIP E911 rules.

Big River is a full service telecommunications provider serving the Mid-western United States for over 20 years. Big River focuses on providing customized solutions tailored to meet its customers' needs for local and long distance voice services, high-speed data and Internet access, hosted applications like e-mail and Internet, Virtual Private Networks ("VPNs") and VoIP services. Big River provides wholesale VoIP services primarily to cable television ("TV") Multiple System Operators ("MSOs"). The Company does not market or support nomadic services. In fact, at installation of the VoIP service, the Customer Premises Equipment ("CPE") to be used with the VoIP service is permanently fastened to the customer's premises making nomadic use of the service virtually impossible. Any movement of equipment capable of carrying VoIP service is restricted by the Company.

---

<sup>1</sup> *IP-Enabled Services, E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking* 20 FCC Rcd. 10245 (2005) ("*VoIP E911 Order*").

As required by the Commission's rules, and consistent with the Public Notice issued by the Enforcement Bureau on November 7, 2005<sup>2</sup> (the "Public Notice"), this Report details Big River's efforts to provide E911 service to customers in compliance with Commission Rule 9.5(b) and (c), and comply with registered location requirements of Commission Rule 9.5(d).

- 1) **A quantification, on a percentage basis, of the number of subscribers to whom the Company is able to provide 911 service in compliance with the rules established in the *VoIP 911 Order*.**

Since the initiation of its VoIP service on August 1, 2004, the Company has been able to provide compliant VoIP 911 service to 100% of the Company's VoIP subscribers.

- 2) **A detailed statement as to whether the Company is transmitting, as specified in Paragraph 42 of the *VoIP 911 Order*, "all 911 calls to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the Selective Router, the trunk line(s) between the Selective Router and the PSAP, and such other elements of the Wireline E911 Network as are necessary in those areas where Selective Routers are utilized."**

The Company is transmitting all 911 calls of its VoIP customers in accordance with Paragraph 42 of the *VoIP E911 Order*. The Company provisions and connects its trunk facilities from its CLASS 5 local switching platform to the 911 tandem/selective routers in all service areas. All automatic number identification ("ANI") information is delivered to the selective router allowing for automatic location identification ("ALI") queries to be made from the master street address guide ("MSAG") for final delivery to the public safety answering position ("PSAP"). The Company is responsible for all customer MSAG data entry and maintains all customer ALI information in the MSAG.

- 3) **If the Company is not transmitting all 911 calls to the correct answering point in areas where Selective Routers are utilized, a detailed explanation of why not.**

Not applicable. Please see the Company's response to Item 2, above.

- 4) **The number of Selective Routers to which the Company has interconnected, directly or indirectly, as of November 28, 2005.**

As of November 28, 2005, the Company has interconnected to three (3) Selective Routers, either directly or indirectly.

- 5) **A detailed statement as to whether the Company is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information.**

---

<sup>2</sup> *Enforcement Bureau Outlines Requirements of November 28, 2005 Interconnected Voice Over Internet Protocol 911 Compliance Letters*, WC Docket Nos. 04-36 and 05-196, Public Notice, DA 05-2945 (rel. Nov. 7, 2005).

The Company is transmitting via the Wireline E911 Network the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information. All ANI information is delivered to the selective router allowing for ALI queries to be made from the MSAG for final delivery to the PSAP. The Company maintains all customer ALI information in the MSAG.

- 6) The percentage of how many answering points within the Company's service area are capable of receiving and processing ANI and Registered Location information that the provider transmits.**

To Big River's knowledge and belief, 100% of answering points in the Company's service area are capable of receiving and processing ANI and Registered Location information transmitted by the Company.

- 7) The percentage of subscribers whose ANI and Registered Location are being transmitted to answering points that are capable of receiving and processing this information**

To the Company's knowledge and belief, ANI and Registered Location information is capable of being transmitted to the answering points of 100% of the Company's VoIP customers.

- 8) If the Company is not transmitting the 911 caller's ANI and Registered Location to all answering points that are capable of receiving and processing this information, a detailed explanation why not.**

Not applicable. Please see the Company's responses to Item 5, above.

- 9) To the extent the Company has not achieved full 911 compliance with the requirements of the *VoIP 911 Order* in all areas of the country by November 28, 2005, the Company should describe in detail, either in narrative form or by map, the areas of the country, on an MSA basis, where it is in full compliance and those in which it is not.**

Not applicable. As previously described, the Company does not market or support nomadic VoIP services, and, in fact, it is virtually impossible for the Company's VoIP service to be operated nomadically. The Company is in full compliance with the requirements of the *VoIP E911 Order* in those areas in which it provides its VoIP services, which is currently Southeastern Missouri.

- 10) If not in full compliance, the Company's plans for coming into full compliance with the requirements of the *Order*, including its anticipated timeframe for such compliance.**

Not applicable. Please see the Company's response to Item 9, above.

- 11) A detailed description of all actions the Company has taken to obtain each existing subscriber's current Registered Location and each new subscriber's initial Registered Location (including, but not limited to, relevant dates and methods of**

**contact with subscribers and a quantification, on a percentage basis, of the number of subscribers from whom the Company has obtained the Registered Location).**

For customers that port their service from the incumbent local exchange carrier (“ILEC”), the Company receives a Customer Service Record (“CSR”) from the ILEC. The customer is asked to verify the information in the CSR including their 911 location upon signing up for service. Once a customer has completed a number port to the Company’s service, ALI information in the MSAG database is re-verified.

For new customers establishing service with the Company, all new customer records include collection of address, phone number and all general billing information during an initial dialog with the new customer.

- 12) A detailed description of the method(s) the Company has offered its subscribers to update their Registered Locations. This information should include a statement as to whether the Company is offering its subscribers at least one option for updating their Registered Location that permits them to use the same equipment that they use to access their interconnected VoIP service.**

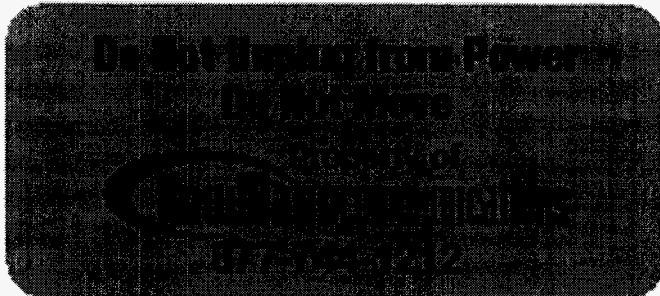
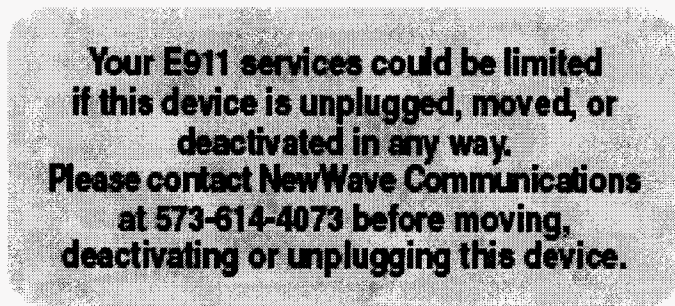
The Company’s customer service department is available Monday through Friday, 8am to 5pm central and 8am to noon Saturdays to receive and update customer account information including location changes. All location changes must be associated with a work order to track and provide assistance with the change order, including, but not limited to, reinstallation of customer equipment and re-verification of equipment assignment within the Company’s network. Alternatively, customers can notify the Company’s customer care department of location changes via the customer web portal.

As described above, the Company offers its subscribers the option of updating their Registered Location using the VoIP telephone equipment that they use to access their interconnected VoIP service by dialing the Company’s customer service department.

- 13) A detailed description of any technical solutions the Company is implementing or has implemented to ensure that subscribers have access to 911 service whenever they use their service nomadically.**

Not applicable. As previously described, the Company does not support nomadic VoIP service. At installation of the VoIP service, the CPE to be used with the VoIP service is permanently fastened to the customer’s premises making nomadic use of the service virtually impossible. Any movement of equipment capable of carrying VoIP service is restricted by the Company. Labels with warnings indicating that 911 service may be unavailable should the VoIP device be powered off or moved are applied to all customer premises equipment. All customers are advised of this at point of installation. Customers are required to read and acknowledge the limitations of 911 if the Company is not notified regarding any planned move.

Below are examples of the warning labels applied to all VoIP devices installed by the Company or their wholesale voice customers (such as NewWave Communications).



- 14) A description of any automatic detection mechanism that enables the Company to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensure that the customer continues to receive 911 service even when using the interconnected VoIP service nomadically.

Not applicable. As previously described, the company does not support nomadic VoIP and given that the CPE used with the service is permanently fastened to the customer's premises, nomadic use of the Company's VoIP service is virtually impossible. Furthermore, all VoIP CPE devices are registered with the Company's call agent (a class 5 local switch). The Company employs an automatic detection mechanism to the extent that if the call agent loses management communication with the VoIP device, an alarm to the Company's Network Operations Center ("NOC") will be generated. Alarms are also generated from the MSO's cable plant surveillance system. Tickets are then created with follow up from the appropriate customer care group. All VoIP customers sign contracts that include an explanation of the consequences of powering off or moving the VoIP device.

Respectfully submitted,


*Catherine Wang* JRS

Catherine Wang  
Wendy M. Creeden

Counsel for Big River Telecom, Inc.  
d/b/a Big River Networks

cc: Byron McCoy (FCC)  
Kathy Berthot (FCC)  
Janice Myles (FCC)  
Best Copy and Printing, Inc.  
Ken Keaveny (Big River)

I, Kevin Keaveny, state that I am Vice President of Engineering and Operations, of Big River Telephone; that I am authorized to submit the forgoing *VoIP E911 Compliance Report* ("*Report*") on behalf of Big River Telephone; that the *Report* was prepared under my direction and supervision; and I declare under penalty of perjury that the *Report* is true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Kevin Keaveny". The signature is fluid and cursive, with the first name "Kevin" and last name "Keaveny" clearly distinguishable.

---

Name: Kevin Keaveny  
Title: Vice President – Engineering & Operations  
Big River Telephone Company, LLC